



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

27 June 2013

093-00038

Mr. Michael Parsons
Engineering and Operations
Bedford Recycling, Inc.
904 Summit Lane
Bedford, IN 47421

Re: Bedford Recycling - self-disclosure

Dear Mr. Parsons,

Thank you for your submission of the Self-Disclosure referenced above; it is administratively complete.

I am forwarding your submission to Phil Perry (317/232-8457), Office of Air Quality, for determination of whether it meets IDEM's Self-Disclosure and Environmental Audit Policy.

Sincerely,

Lori Kyle Endris
Self-Disclosure and Environmental Audit Administrator

cc: Phil Perry, OAQ



904 SUMMIT LANE
BEDFORD, IN 47421
Ph. 812-275-6883
Fax 812-277-3527

6-26-2013

RECEIVED

JUN 27 2013

IDEM-OLC

Dear Sir or Madam,

Bedford Recycling recently discovered a non compliance related to its auto shredder and the need for an air permit registration. Below please find a description of how the non compliance was found and justification for consideration of a 100% reduction in penalties related to this non conformance, as outlined in IDEM policy # MP-004-R2-NPD relating to self disclosure of non compliance.

- A. Bedford Recycling discovered its non compliance with assistance from IDEM's Compliance and Technical Assistance Program.
- B. Bedford Recycling used information provided by IDEM Compliance and Technical Assistance Program to voluntarily determine that there was a non compliance. At the time that the shredder was installed, there was an inspection by a representative from the Office of Air Management, IDEM, and there were no violations determined at that time. Recently IDEM changed the emission factor being used for VOC for shredders which changed the PTE for Bedford Recycling's shredder to a level that required registration. The application of the new EF caused Bedford Recycling to fall into non-compliance. Bedford Recycling was not aware of this change until the visit from Hani Sharaya, IDEM Compliance and Technical Assistance Program.
- C. Bedford Recycling received guidance from IDEM Compliance and Technical Assistance Program that a registration was needed, and that the to avoid penalty, needed to disclose the non compliance to IDEM within 45 days. Bedford Recycling mailed this disclosure letter to IDEM on 6/26/2013.
- D. Bedford Recycling is disclosing this non-compliance prior to and with no knowledge of any third party action or pending third party action.
- E. Bedford Recycling is planning to correct the non compliance by submitting a registration application.
- F. Bedford Recycling regularly attends environmental conferences for the recycling industry and will continue to do so. If there are future changes that could potentially affect Bedford Recycling's compliance status, Bedford Recycling will have made a satisfactory attempt to learn of them.
- G. This is not a repeat violation.
- H. This violation does not meet the criteria of any of the violations that are excluded from the self disclosure policy.
- I. Bedford Recycling will cooperate in determining the applicability of this policy.

Thank you in advance for your consideration of 100% reduction in penalty related to this matter.

A handwritten signature in black ink, reading "Michael Parsons". The signature is written in a cursive, flowing style.

Michael Parsons
Engineering and Operations
Bedford Recycling Inc



904 SUMMIT LN.
BEDFORD, IN 47421



Self Disclosure and Environmental Audit Administrator
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